### PCB INSPECTION REPORT

Hubert Thompson 2810 N. Spring/3615 St. Louis Ave.

St. Louis, MO 63163 Telephone: (314) 832-6782 Date: February 24, 1989 Inspection No. 022489M001T01 Docket No. 07-89-T-369

### Introduction

This inspection was conducted because of a request from EPA Region VII to see if Mr. Rubert Thompson complied with a Consent Agreement and Final Order which required proper disposal of PCB transformers at his warehouse at the location shown above (Attachment 1). The inspection was to determine compliance with PCB regulations codified in 40 CFR Part 761.

### Inspection \_

On Pebupary 21, 1989 17, tried calling Mr. Hubert Thompson at the number shown above 1871 was not abid to Yearh his until late in the evening. I told Mr. Thompson that I was saked by RPA to do an inspection of his warehouse at the locations shown above 18e said he would be out of town the next two days but could neet on February 28, 1989 I hade in appointment to meet Mr. Thompson at 8 30 3 M. Lon February 24, 1989, at the address shown above.

On February 24, 1989, at 8:45 a.m., I presented my credentials to Mr. Hubert Thompson, owner, and Mr. Roger R. Hopson, President of Environmental Operations, Inc. Mr. Hopson represented the consulting firm that had been advising Mr. Thompson on how to dispose of the PCB transformers. I issued the Notice of Inspection and Confidentiality Notice to Mr. Thompson who signed both. Mr. Thompson said there would be no claim of confidentiality.

Mr. Thompson said that because the test results of swabs taken from the concrete pad that the Moloney transformers were on showed between 300 and 100,000 ppm PCBs, he disposed of the concrete pad. He said that the drums were picked up for disposal on February 23, 1989, by U.S. Pollution Control, Inc., Oklahoma City, Oklahoma. I asked if he had a copy of the manifest. Mr. Thompson said that his attorney, Mr. James C. Owen, had the manifest along with all other information pertaining to the transformers. I asked Mr. Thompson to send me a copy of the manifest. On March 6, 1989, I received a copy of Manifest No. 006 showing that three drums of solids were shipped to PPM, Inc. on February 23, 1989 (Attachment 7). Manifests for the ten PCB transformers, 16 switches and the oil from the PCB transformers were also sent and are Attachments 8 through 10 to this report.

I asked to inspect the areas where the PCB transformers had been removed. We then proceeded to the site where the concrete pad had been removed. There was no power in the building, but Mr. Thompson had a hand-held generator with a light attached to it. Mr. Thompson had removed about a four inch deep by eight foot wide by ten foot long area of concrete (Photo 1). There were no visible signs of oil contamination. Sample No. 89-9026 consisting of approximately 500 ml of a composite of several random grabs of soil was collected. Duplicate samples were requested and provided.

S00072979 SUPERFUND RECORDS PCS Inspection Report Hubert Thompson February 24, 1989 Page Two

We then proceeded to the substation facing Grand Avenue (Photo 2). There was no indication that any oil had been spilled while the transformers were removed. Mr. Hopson said they chipped out an area of the concrete that had the most discoloration and below a transformer drain. He said the analysis showed less than 2 ppm PCBs.

### Closing Conference

The closing conference was with Mr. Hubert Thompson, owner, and Mr. Roger P. Hopson, President of Environmental Operations, Inc. Mr. Thompson signed the Receipt for Samples, Declaration of CBI and Summary of Observations. Mr. Thompson wanted to know when he could start filling in the area where the transformers were removed. I told him he would have to wait until he gets approval from EPA.

SUBMITTED BY:

Pohert I. Frager

Environmental Specialist

Enforcement Section Waste Management Program

March 8, 1989

RIK: dr

Attachment

Modify for Last 181

Summary of Observations Confidentiality Motion

Declaration of CBI

Manifest No. 006

Manifest No. 001 Manifest No. 002

Manifest No. 002

Manifest No. AR-375660

Map of Warehouse

Photographs

Chain of Custody

FTTS

APPROVED BY:

Lyle O. Crocker, Chief Transportation/PCB Unit

Enforcement Section

Waste Management Program

MISSOURI DEPARTMENT OF NATURAL RESOURCES
Division of Environmental Quality
Waste Management Program
P.O. Box 176 Jefferson City, Missouri 65102
314-751-3176

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## MISSOURI DEPARTMENT OF NATURAL RESOURCES Division of Environmental Quality Waste Management Program P.O. Box 176 Jefferson City, Missouri 85102 314-751-3176

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MISSOURI DEPARTMENT OF NATURAL RESOURCES
Division of Environmental Quality
Waste Management Program
P.O. Box 176 Jefferson City, Missouri 65102
314-751-3176

## **HAZARDOUS WASTE MANIFEST**

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11	P/U: UId Carter Carb, Grand	a St. Louis Ave, on or	-24-89 4 10	7:00 am							
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STATE OF ARKANS Department of Polic, on Control and Ecology P. O. Box 9583 Little Rock, Arkansas 72219 Telephone 501-562-7444

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1	١ſ	3 Generator's Name and Marking				<b>-</b>			Manifest Document		
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ı	П	15 Special Handling Instructions	and Additional Infor	namon Dike & Co	ontain i	n case o	f spil	1. "1	PCB MANIFE	ST"	
1		P/U: Old Carter	Carb Plant	, Grand & St	. Louis	Ave, St.	Louis	, MO	on 1-24-8	9 6	B:00 am
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Photo #1. Depicts area where Sample No. 89-9026 was collected.

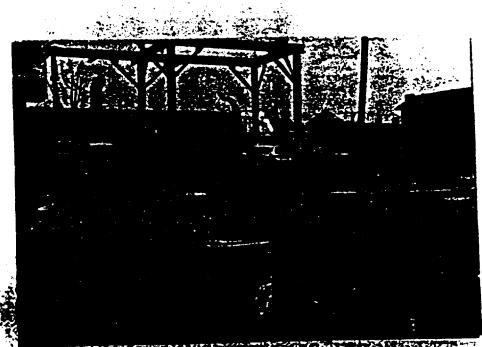


Photo #2. Depicts substation facing Grand Avenue showing the four transformers had been removed.

# DIVISION OF ENVIRONMENTAL RESOURCES Division of Environmental Quality Field Sheet and Chain of Custody Record

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